

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-9-E**

IN RE: South Carolina Electric & Gas)	
Company's Integrated Resource Plan)	INTERVENOR, SOUTH CAROLINA
(IRP))	SOLAR BUSINESS ALLIANCE, INC.'S
)	FIRST SET OF
)	INTERROGATORIES
)	

TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY:

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, "SCSBA"), pursuant to Reg. 103-835 and Rule 33, of the South Carolina Rules of Civil Procedure, hereby serves, **South Carolina Electric & Gas Company**, (hereinafter as, "SCE&G") with Intervenor, South Carolina Solar Business Alliance, Inc.'s First Set of Interrogatories, to be answered separately within twenty (20) days from the date of service hereof. Please set forth SCE&G's answers separately, after restating the question.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all answers to the below Interrogatories shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the answers to these Interrogatories in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2" x 11" format.
6. That each Interrogatory be reproduced at the beginning of the answer thereto.

7. If the answer to any Interrogatory is that the information requested is not currently available, state when the information requested will become available.

8. These Interrogatories shall be deemed continuing, so as to require SCE&G to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

9. If a privilege not to answer an Interrogatory is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

10. If a refusal to answer an Interrogatory is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each Interrogatory on the basis of the entire knowledge of SCE&G, including information in the possession of SCE&G, or its consultants, representatives, agents, experts, partners, employees, independent contractors and attorneys, if any.

12. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for SCE&G's inability to answer.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your” shall refer to, SCE&G.**
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.

3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of SCE&G and specifically includes the computer and or laptop computers utilized by Representatives of SCE&G. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and SCE&G.

4. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in your possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

FIRST SET OF INTERROGATORIES

1. Please explain in detail why SCE&G did not include in its 2018 Integrated Resource Plan any of the following language which appeared in SCE&G's 2017 Integrated Resource Plan:

SCE&G usually peaks in the summer as seen in the following chart. This is reasonable for several factors. First, the climate in SCE&G's service area is generally hotter in the summer than colder in the winter in the sense that kWh sales are about 15% higher in the summer than winter. Second, the penetration of air-conditioners among SCE&G's customers approaches 100% since there are no real substitutes for electric air-conditioners at present. Finally, a large number of electric customers heat their homes and/or businesses with natural gas. Results of the peak demand forecast methodology used herein show that the general pattern of higher summer peaks relative to winter peaks will continue.

2. Is it SCE&G's position that a general pattern of higher summer peaks relative to winter peaks will prevail over the 15 year period analyzed in the IRP ("the planning period")? If not, please explain why.

3. Is it SCE&G's position that a general pattern of lower summer peaks relative to winter peaks will prevail over the planning period? If not, please explain why.

4. Please describe in detail SCE&G's expectations concerning the relative magnitude of summer and winter peaks over the planning period. If these expectations have changed since the 2017 IRP, please including an explanation of all factors which have changed, or which have caused you to reach different conclusions than SCE&G reached in the past.

5. Please provide a detailed explanation of all potential changes to SCE&G's system operations that SCE&G is considering, or has begun evaluating, in anticipation of increased amounts of solar energy on SCE&G's system, including but not limited to, changes relating to "ramp rates" of existing base load generating units, changes relating to the operation of pumped storage units, changes relating to off-system power purchases and sales, and any other changes that could have the effect of reducing system costs or improving operational efficiency under circumstances where solar energy provides an increased share of the overall resource mix.

6. Please provide a detailed statement of how many MWh of electrical energy can be generated by the Fairfield Pumped Storage Plant during a single cycle (starting with a full reservoir of water and ending with no water remaining in the reservoir), and include in this explanation how long (in hours and minutes) the plant can operate at its full 576 MWs of nameplate capacity before the reservoir is emptied.

7. Please provide a detailed explanation of why SCE&G is assuming Demand Response will grow more slowly than Forecasted load during the planning period.

8. Please provide a detailed explanation of any transmission constraints or other factors which limit SCE&G's ability to purchase energy and capacity from merchant generating plants in nearby states.

/s/

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April 26, 2018
Columbia, South Carolina